

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE ANNUITY, WELFARE, APPRENTICESHIP SKILL
IMPROVEMENT & SAFETY FUNDS of the
INTERNATIONAL UNION OF OPERATING ENGINEERS,
LOCAL 15, 15A, 15C and 15D, AFL-CIO by its TRUSTEES
JAMES T. CALLAHAN, WILLIAM H. HARDING,
LYNN A. MOUREY and ROBERT SHAW, and JOHN and
JANE DOE, as Beneficiaries of the ANNUITY, WELFARE,
APPRENTICESHIP SKILL IMPROVEMENT & SAFETY
FUNDS of the INTERNATIONAL UNION OF OPERATING
ENGINEERS, LOCAL 15, 15A, 15C and 15D, AFL-CIO,

Plaintiffs,

-against-

HIRANI ENGINEERING & LAND SURVEYING, P.C.,

Defendant.
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**NOTICE OF MOTION
FOR DEFAULT JUDGMENT**

07-CIV-5575 (LTS) (THK)

PLEASE TAKE NOTICE, that upon the Affidavit of JAMES M. STEINBERG, ESQ., sworn to on the 11th day of July, 2007, Plaintiffs' Statement of Damages, and upon all of the prior papers and proceedings heretofore served and had herein, Plaintiffs, by their attorneys BRADY McGUIRE & STEINBERG, P.C., will move this court, at the United States Courthouse located at 500 Pearl Street, New York, New York, Courtroom 17C, before the Honorable Laura Taylor Swain, at 9:30 a.m. on the 21st day of August, 2007 or as soon thereafter as counsel may be heard, for a judgment of default against Defendant HIRANI ENGINEERING & LAND SURVEYING, P.C. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure in the amount of \$9,939.48,

together with such other and further relief as this Court may deem just, proper and equitable.

Dated: Hastings-on-Hudson, New York
July 11, 2007

Respectfully submitted,

BRADY McGUIRE & STEINBERG, P.C.

By:


James M. Steinberg (JS-3515)

Attorneys for Plaintiffs

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TO: HIRANI ENGINEERING & LAND SURVEYING, P.C.
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